

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

YESENIA KRYSTAL MORALES GARCIA

DEBTOR

CASE NO 15-04741/ESL

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS  
DOCKET NO. 29 and  
REQUEST FOR EXTENSION OF TIME TO CURE BALANCE ON PLAN ARREARS**

TO THE HONORABLE COURT:

**COMES NOW, YESENIA KRYSTAL MORALES GARCIA**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On November 28, 2016, FirstBank Puerto Rico, filed a *motion to dismiss*, docket #29, basically alleging that the debtor is in arrears in the Plan payments in the sum of \$1,650.00.

2. The debtor hereby replies to the FirstBank motion respectfully stating that on December 21, 2016, the debtor made an \$850.00 Plan payment to the Trustee to partially cure the Plan arrears. Attached is evidence of money orders #17491971392 and #17491971391.

3. The debtor is still in arrears in the Plan payments (\$800.00) and the debtor proposes to cure these arrears within thirty (30) days.

4. Based on the aforementioned, the debtor respectfully requests an additional extension of time of thirty (30) days within to cure the balance owed on the Plan arrears and inform the Court, accordingly. This extension of time to expire on January 21, 2017.

**WHEREFORE** debtor respectfully prays this Honorable Court grant the present reply to the Trustee's motion requesting dismissal, and grant the requested extension of time.

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Debtors' Reply to Trustee's Motion to Dismiss  
Case no. 15-04741/ESL13

I HEREBY CERTIFY that on this same date a copy of this notice was electronically filed with the Clerk of the Court using CM/ECF system which will send notifications of such to the Chapter 13 Trustee and to all CM/ECF participants; I also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: debtor, Yesenia Krystal Morales García, PO Box 370, Juncos, PR 00777, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 22<sup>nd</sup> day of December, 2016.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

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WESTERN UNION FINANCIAL SERVICES, INC. ISSUED: Englewood, Colorado

17-491971392

A 141759 D 122116  
T 1503 01  
174919713920 L 000003 \$ **350.00**

PAY EXACTLY THREE HUNDRED FIFTY DOLLARS AND NO CENTS

PAY TO THE ORDER OF Alejandro Oliveras Arizaga - Sandra PAYMENT FOR ACCT #

Cal #131 PURCHASER'S ADDRESS #150477

PURCHASER'S SIGNATURE

PURCHASER BY SIGNING YOU AGREE TO THE TERMS ON THE REVERSE SIDE

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17-491971391

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17491971391 L 000003 \$ 500.00

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\* 17491971391 \*



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